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Pro Hac Vice application filed for:
Robert Garson, Esq.
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Attorneys for Matthew Taibbi

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK DIVISION**

MATTHEW TAIBBI,

Plaintiff,

Civil Action No.: 2:25-cv-02275-EP-LDW

v.

**NOTICE OF MOTION
TO ADMIT COUNSEL
ROBERT D. GARSON, ESQ.
*PRO HAC VICE***

SYDNEY KAMLAGER-DOVE,
Defendant.

X

PLEASE TAKE NOTICE that on April 11, 2025 at 10:00 a.m., or as soon as counsel may be heard, the undersigned shall move, before the District Court Judge for the United States District Court, District of New Jersey, Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07102, for an Order granting Robert D. Garson to appear in this matter *Pro Hac Vice*

for the purpose of assisting in the representation of Attorneys for Plaintiff Matthew Taibbi (“Plaintiff”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, counsel for Plaintiff will rely upon the accompanying Certification of Michael Steinmetz, Esq., submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

DATED: April 4, 2025
New York, NY

Respectfully submitted,

**Garson Segal
Steinmetz Fladgate LLP**

GS2Law PLLC

/s/ Michael Steinmetz
Michael Steinmetz (MS-3164)

/s/ Robert Garson
Robert Garson
(to be admitted pro hac vice)
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